

Keith Rivers  
530 Reliant Wy  
American Cyn, CA 94503  
510-334-0418  
Plaintiff, In Pro Per

**FILED**

**OCT 23 2019** *ojs*

SUSAN Y. SOONG  
CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA  
OAKLAND OFFICE

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

*C*  
KEITH RIVERS  
Plaintiff,  
vs.

NATIONAL UNIVERSITY,  
Defendant(s)

Case No.:

**C19-6894** *JCS*

EDUCATION DISCRIMINATION  
COMPLAINT

I, Keith Rivers ("Plaintiff") declare that the following is true and correct, and if called as a witness, I could competently testify to the matters hereinafter set forth which are within my personal knowledge:

DESCRIPTION OF CASE

The Plaintiff is currently a graduate student in English at National University. Before the Plaintiff enrolled at National University (Defendant), which was on February 26, 2019 at 2:16 pm, the Plaintiff emailed Student Finance Advisor Marina Dalton and asked, "Will I be able to use the grad plus loan and can I submit my rental lease to determine my aid package?" On the very same day, at 2:31 pm, Marina replied, "Your rental lease may or may not be necessary,

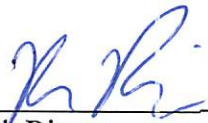
please wait to receive your checklist.” She also stated in the same email, “The Grad Plus loan is credit based so it is not guaranteed and it has a higher interest rate of 7.6%, I suggest saying no to the Grad Plus loan unless you think you will need it in the future. You can always apply for the Grad Plus loan later if you decide you want it.” I pray to the court to examine the quickness in response from the Defendant when it’s time to make a sell to the Plaintiff, but when it was time to help out the Plaintiff with his serious concerns, the Defendants were slow, if at all, to respond back by way of email or phone. On March 8, 2019 at 4:32 pm, the Defendant confirmed the Plaintiff’s enrollment at National University. On April 8, 2019, the Plaintiff emailed [finaidinfo@nu.edu](mailto:finaidinfo@nu.edu) and Student Finance advisor Lynn Nakamoto replied. The Plaintiff emailed the Defendant because he had attended National University for five weeks and had yet to receive any financial aid whatsoever. Lynn replied on the same day, “For now we just need to patiently wait and let it process, pending Financial Aid, we will see what you qualify for to take care of the balance.” On April 10, 2019, Financial Aid Counselor Camille Ancheta said, “I am sorry, I do not know when your award letter will be issued. Your file is being reviewed by our Financial Aid Committee so it may take a little longer.” The Plaintiff did not receive any financial aid until April 24, 2019, seven weeks after classes started. But the amount of aid the Plaintiff received was the average amount that all students receive and was not sufficient to the Plaintiff. This is why the Plaintiff wanted to submit his lease before he enrolled and started classes in order to ensure that his financial aid package would be correct and to avoid any and all issues. The financial aid awarded to the Plaintiff was \$2,000 per month. This was not sufficient to the Plaintiff because his rent alone is \$2,269.05 per month. The award originally offered to the Plaintiff does not cover the other Cost of Attendance costs like: utilities, transportation, food, and personal. On May 1, 2019, the Plaintiff emailed Marina (the Defendant that was asked about the

Plaintiff's lease on February 26, 2019) and said, "I need to have a budget increase due to my rental lease. Attached is my current lease. How long will it take to make the changes to my financial aid?" As of May 15, 2019, the Plaintiff had yet to receive a budget increase. On the very same day, the Plaintiff emailed the Defendant and said, "I was charged tuition for the month of May and was not given financial aid for housing and other costs of living. Also, I submitted my lease and requested a budget increase but that has yet to happen. I am also behind for two months from March and April." The email was titled, "Ignoring my Concerns". On May 15, 2019, Assistant Director of Financial Aid Ashlie Greene finally responded to the Plaintiff and said, "I apologize for not getting back to you prior, I will research your account and respond first thing in the morning, in the meantime if you have any additional concerns or questions feel free to send them directly to me." On May 24, 2019, Ashlie said, "The committee reviewed your file today and the appeal has been denied at this point due to insufficient documentation." According to the Federal Government and the Department of Education, "Acceptable documentation for a Budget Increase may consist of receipts, estimates of costs, billing statements, written statements, etc." The Defendants have purposely and knowingly lied to the Plaintiff and are breaking their agreement to accept his lease and are breaking the agreement promised by the Department of Education. The Plaintiff respectfully requests that this court grant relief due the negative actions of the Defendants. All of these negative actions occurred towards the Plaintiff strictly and solely because he is a male and he is African American.

Wherefore I am respectfully requesting that the court award damages for tuition, rent and cost of attendance, pre-judgment interest, and for pain and suffering.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: October 21, 2019

  
\_\_\_\_\_  
Keith Rivers  
Plaintiff, In Pro Per

## Example of Financial Aid and Budget Increase based on Lease.

[https://financialaid.ucsc.edu/appeals/appeals/higher\\_costs.html](https://financialaid.ucsc.edu/appeals/appeals/higher_costs.html)

**UC SANTA CRUZ**

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## FINANCIAL AID *and* SCHOLARSHIPS


[About Us](#)
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[Next Steps](#)
[Types of Aid](#)
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[Financial Aid Policies](#)

[Forms/Resources](#)
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Appeals:

- Independent Status
- Family Financial Changes
- Increased Educational Costs
- Satisfactory Academic Progress

Home / Forms and Appeals / Increased Educational Costs



### Appeals for a Student Budget Increase

If you are incurring education related expenses that are greater than our cost of attendance budget, you may submit a **budget appeal** to have the additional expenses added to your budget. This may result in additional financial aid depending on the availability of funds. Approved budget increases are generally funded with loan. The Budget Increase Form can be obtained at our office.

Expenses must be incurred during the current academic year or summer during which you are enrolled at UCSC, and you must provide documentation for requested budget additions. Please submit a paragraph describing the reason for the increase you are requesting and attach supporting documentation for the cost.

**Please note: the last day to submit a budget increase for the 2018-19 academic year is April 1, 2019.**

### Reason To Appeal

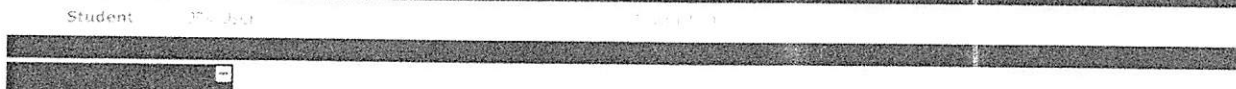
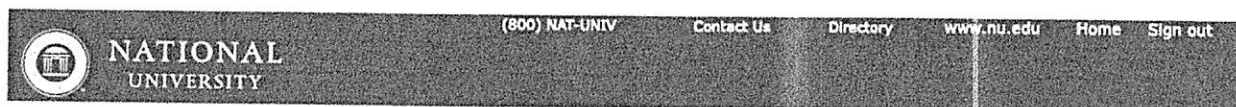
Expenses that may be considered for budget appeals include:

- Rent/Mortgage or Utilities
- Transportation expenses
- Computer purchase
- Medical, dental or vision expenses not covered by insurance
- Special books, course fees, or supplies
- Childcare expenses

### Documents Required

- Submit a Budget Increase Form (available at our office)
- Acceptable documentation may consist of receipts, estimates of costs, billing statements, written statements etc.
- The documentation needs to show an educationally related expense that exceeds the allotment in the standard budget
- For computer budget increases, we require a receipt follow up after we supply aid for the budget increase.



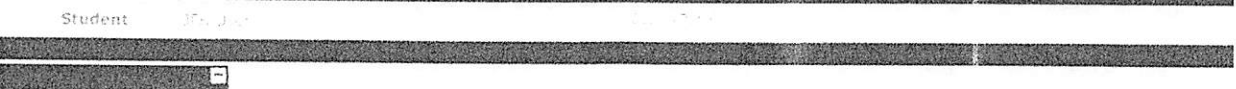
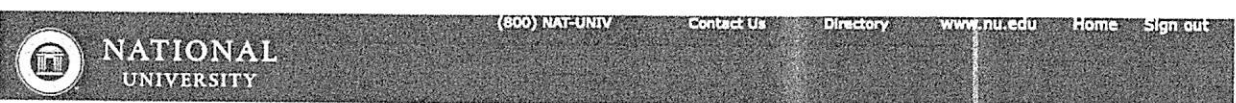


- Academics
- Alumni
- Career Services
- Employment
- Extended Learning Students
- Finances
- Financial Aid
- Graduation
- Help
- International Students
- New Student Information
- Nursing
- Personal Information
- Resources for Classes
- Resources for Instructors
- Apply Today!
- My Message Center

### Account Details

ID:	630121059	Rivers, Keith Joseph	Business Unit:	NATLU
Account Number:	TUI001	2019-Apr	Account Balance:	0.00
Debits:	5,935.00	Credits:	-5,935.00	Applied:
			5,935.00	Unapplied:
				0.00

Item	Term	Amount
Class	Installment ID    Last Activity Date	Balance
Direct Grad Plus Loan 1 OY	2019-Mar	+1,935.00 Term Details
	04/24/2019	0.00 Term Details
EFT Refund to Student	2019-Apr	-4,000.00 Term Details
	04/29/2019	0.00 Term Details
Direct Grad Plus Loan 1 OY	2019-Apr	+4,000.00 Term Details
	04/24/2019	0.00 Term Details



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### Account Details

ID:	630121059	Rivers, Keith Joseph	Business Unit:	NATLU
Account Number:	TUI001	2019-May	Account Balance:	0.00
Debits:	3,935.00	Credits:	-3,935.00	Applied:
			3,935.00	Unapplied:
				0.00

Item	Term	Amount
Class	Installment ID    Last Activity Date	Balance
Direct Grad Plus Loan 2 OY	2019-Mar	+1,935.00 Term Details
	05/07/2019	0.00 Term Details
EFT Refund to Student	2019-May	-2,000.00 Term Details
	05/16/2019	0.00 Term Details
Direct Grad Plus Loan 2 OY	2019-May	+2,000.00 Term Details
	05/16/2019	0.00 Term Details

440 Napa Junction Rd  
American Canyon, CA 94503-1281Billing Support: 707-391-0774  
jponce@reliantpropertymgmt.com  
Monday-Friday 8am-5pm, Sat 10am-5pm - Closed Sunday**AMOUNT DUE: \$2,269.05**  
**DUE DATE: 03/01/2019****CHARGE DETAILS****Property Charges:**

Rent	\$2,175.00
Trash Service	\$20.00
<b>Property Charges Due</b>	<b>\$2,195.00</b>

**Billed Charges:**

Usage: Water	
Date: (12/03/2018 - 01/02/2019)	3260 Gallon
Adjmt: 0	
Beg Read: 5962A	End Read: 6288P
Meter Factor: 10.000	
Water	Rate/Gallon: 0.0083411 x 3260.000
Water Base Fee (12/3/2018 - 1/2/2019)	\$27.19
Base Fee Amt	\$0.77
Sewer Base Fee (12/3/2018 - 1/2/2019)	
Base Fee Amt	\$41.34
Monthly Service Fee (12/3/2018 - 1/2/2019)	
Flat Amt: 4.7500000	\$4.75
<b>Billed Charges Due</b>	<b>\$74.05</b>
<b>AMOUNT DUE</b>	<b>\$2,269.05</b>

Statement Date: 2/11/2019

Customer Name: **KEITH RIVERS**

Account Number: 3747721 - 10304

Resident ID: 374772120190310230C

**Conservation Tip**

Don't let the faucet run while you clean vegetables. Rinse them in a filled sink or pan. Saves 150 to 250 gallons a month.

\*This account statement is generated by RealPage Utility Management, 2201 Lakeside Blvd Richardson, TX 75082. Some charges appearing on this statement may be allocated from master property bills from the respective utility provider(s). Property Charges reflect data in the resident ledger as of the date bills were printed and mailed. Your local water provider is City of American Canyon. This bill is not from City of American Canyon. Charges are billed to residents based upon their lease agreements. To report a water leak or improperly working water fixture or water saving device or for details on rate calculations contact Billing Support at the phone number or email address above. Please contact your leasing office at the Service Address above for other billing inquiries or disputes.

Please detach here and return bottom portion with your payment.

Page 1 of 2

Canyon Ridge at Napa Junction  
440 Napa Junction Rd  
American Canyon, CA 94503-1281

&gt;009010 2666597 0001 092770 10Z

KEITH JOSEPH RIVERS  
530 RELIANT WAY  
AMERICAN CANYON, CA 94503-3239

RESIDENT ID	BLDG UNIT
374772120190310230C	Unit #530
ACCOUNT NUMBER	STATEMENT DATE
3747721 - 10304	02/11/2019
AMOUNT DUE	DUE DATE
<b>\$2,269.05</b>	<b>03/01/2019</b>

Please make check payable to:  
Canyon Ridge at Napa Junction

Check Number

Canyon Ridge at Napa Junction  
440 Napa Junction Rd  
American Canyon, CA 94503-1281



# CANYON RIDGE AT NAPA JUNCTION

## Eviction Warning

06/07/2019

APT.# 530

As of this date, we still have not received your past due balance of **\$2305.22**

This letter is to inform you that we will be turning this matter over to our attorney's office to begin the eviction process for non-payment of rent on 06/10/2019 at 9AM.

Please be advised that negative information from evictions and subsequent judgments against you become a matter of public record. This can damage your credit and rental history for years to come. Our policy and many other communities, is that we do not rent to anyone that has had an eviction of 7 years or younger.

If you have any questions concerning this debt, please contact our office as soon as possible. We would dislike having to begin eviction proceedings against you; however your continued non-payment leaves us no other alternative. Attorney fees can be very costly and at a MINIMUM there will be a \$750.00 charged to you for these services.

Thank you in advance for your immediate attention and cooperation.

Respectfully,  
Jacqueline Ponce  
Canyon Ridge Apartments